

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1338-***
v.)	
)	
APPLE COMPUTER, INC., et al.,)	
)	
Defendants.)	

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1337-***
v.)	
)	
AUDIOVOX COMMUNICATIONS)	
CORP., et al.,)	
)	
Defendants.)	

OPTREX AMERICA, INC.,)	
)	
Plaintiff,)	
)	C.A. No. 04-1536-***
v.)	
)	
HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Defendants.)	

NOTICE OF DEPOSITIONS OF NON-PARTY 3M COMPANY

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(1) & (6) of the Federal Rules of Civil Procedure and pursuant to Delaware Local Rules 30.1 through 30.6, Defendants, including Optrex America, Inc. and Fuji Photo Film Co., Ltd., will take the deposition upon oral examination of non-party 3M Company ("3M"), and specifically the witness or witnesses designated by 3M as officers, managing agents, directors, agents, employees or other person(s) who are most knowledgeable and can testify on its behalf with respect to each of the categories identified in Appendix A attached hereto, commencing at 9:00 a.m. on Friday, July 20, 2007 before a notary public or other officer duly authorized to administer oaths at Larson & King, 2800 Wells Fargo Place, 30 East 7th Street, St. Paul, Minnesota, 55101.

At the same location, Defendants, including Optrex America, Inc. and Fuji Photo Film Co., Ltd., will also take the deposition upon oral examination of the following individuals at the following dates and times:

Tuesday, July 17, 2007, 9:00 a.m. - Mark Gardiner

Wednesday, July 18, 2007, 9:00 a.m. - Sandy Cobb

Thursday, July 19, 2007, 9:00 a.m. - Terry Jones

The depositions will also be videotaped. You are invited to attend and cross-examine.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

July 10, 2007

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APPENDIX A

Definitions

- A. “3M” shall mean 3M Company, its officers, directors, employees, partners, agents, corporate parents, subsidiaries, affiliates and predecessors.
- B. “Privacy Products” includes privacy filters, louvers, or louvered light control films developed, manufactured, or sold by 3M for use with electronic displays.
- C. “Bias” means rotation of one or more filters, films or lens sheets with respect to the electronic display.

Topics

- 1. The physical structure and arrangement of Privacy Products prior to July 9, 1992. This includes, but is not limited to the bias of the Privacy Product elements, the functionality and intended problem(s) meant to be solved by such bias, and whether and when such Privacy Products were offered to the public cut at a predetermined bias prior to July 9, 1992.
- 2. Marketing, advertising, recommendations, and instructions, prior to July 9, 1992 regarding Privacy Products, including, but not limited to statements regarding the rotation of Privacy Products that were not cut at a bias.
- 3. The intended and actual use of Privacy Products prior to July 9, 1992, including, but not limited to efforts to reduce Moiré interference by biasing the Privacy Products.
- 4. Confirmation that the Privacy Products were offered to and sold to the public prior to July 9, 1992.

CERTIFICATE OF SERVICE

I, Karen L. Pascale, hereby certify that on July 10, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

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I further certify that on July 10, 2007, I caused a copy of the foregoing document to be served upon the following counsel of record as indicated below:

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